

ROPES & GRAY LLP
ONE METRO CENTER
700 12TH STREET, NW, SUITE 900
WASHINGTON, DC 20005-3948
WWW.ROPESGRAY.COM

June 17, 2015

Mark S. Popofsky T +1 202 508 4624 F +1 202 383 9377 mark.popofsky@ropesgray.com

BY ECF

The Honorable Laura Taylor Swain
United States District Judge
Daniel Patrick Moynihan United States Courthouse
500 Pearl Street
New York, New York 10007

Re: Cablevision Systems Corp. v. Viacom Int'l Inc., 13 CIV 1278 (LTS) (JLC)

Dear Judge Swain:

cc:

We represent plaintiffs Cablevision Systems Corporation and CSC Holdings, LLC in the above-referenced matter. We write jointly on behalf of plaintiffs and defendants Viacom International Inc. and Black Entertainment Television LLC to request an extension of the deadline for substantial completion of document productions from July 31, 2015 to November 6, 2015. As described in the parties' June 15, 2015 letter to Magistrate Judge Cott (Dkt. No. 84), the parties believe this extension is necessary to accommodate anticipated cross-motions to compel production of certain documents subject to non-disclosure provisions in agreements between the parties and certain third parties. The parties have not requested any previous extensions, and jointly consent to this request. Further, the requested extension will not affect any other scheduled dates in the September 5, 2014 Pre-Trial Scheduling Order (Dkt. No. 57). The parties will promptly notify the Court if they believe an extension or modification of the other scheduled dates is necessary.

Respectfully,

Mark S. Popofsky

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All counsel of record (by email)